

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

KEVIN KING, *et al.*,
Plaintiffs,

v.

HABIB BANK LIMITED,
Defendant

Case No. 1:20-cv-04322-LGS-OTW

Case No. 1:21-cv-02351-LGS-OTW

KATHLEEN L. ALEXANDER, *et al.*,
Plaintiffs,

v.

HABIB BANK LIMITED,
Defendant

Case No. 1:21-cv-06044-LGS-OTW

ORAL ARGUMENT REQUESTED

Plaintiffs shall file a response to Defendant's motion
for reconsideration by **August 25, 2023**.

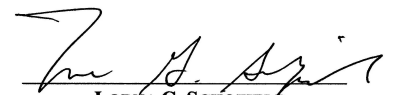
So Ordered.

Dated: August 9, 2023
New York, New York

MARY BORDER, *et al.*,
Plaintiffs,

v.

HABIB BANK LIMITED,
Defendant


LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE

**HABIB BANK LIMITED'S NOTICE OF ITS
MOTION FOR RECONSIDERATION BASED ON
INTERVENING AND CONTROLLING DECISIONS IN *TWITTER* AND *FREEMAN***

PLEASE TAKE NOTICE that, pursuant to Rules 7(b) and 54(b) of the Federal Rules of Civil Procedure and Local Civil Rule 7.1, Habib Bank Limited, by and through undersigned counsel, hereby appears for the purpose of moving the Court, before the Honorable Lorna G. Schofield, United States District Judge, at the United States District Court for the Southern District of New York, 40 Foley Square, New York, New York 10007, at a date and time to be determined

by the Court, for an order (i) reconsidering this Court’s September 28, 2022 Opinion and Order (ECF No. 58), to the extent it denied dismissal of secondary-liability claims under the Anti-Terrorism Act (“ATA”), 18 U.S.C. § 2333(d)(2), in light of the intervening and controlling decisions in *Twitter, Inc. v. Taamneh*, 143 S. Ct. 1206 (2023), and *Freeman v. HSBC Holdings PLC*, 57 F.4th 66 (2023); and (ii) modifying the September Opinion and Order to provide for dismissal of the secondary-liability claims with prejudice under Rule 12(b)(6) of the Federal Rules of Civil Procedure. A memorandum of law in support of this Motion is filed herewith.

Dated: August 8, 2023
Washington, DC

Respectfully submitted,

WHITE & CASE

s/ Christopher M. Curran

Christopher M. Curran

Claire A. DeLelle

Celia A. McLaughlin (*Pro Hac Vice* application
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